

DMD/ycp #18-149

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

=====X
GEORGE W. BROWN,

Case No.: 08 CV 1093 LMM

Plaintiff,

-against-

RULE 26(a) (1)
INITIAL DISCLOSURE

THE BROOKDALE HOSPITAL MEDICAL CENTER,
SANJEEV RAJPAL, M.D., CLASS SURGERY
BROOKLYN GROUP, P.C., THE MOUNT SINAI
HOSPITAL, HOWARD CHOI, M.D., DANIELLE
PERRET, M.D., BRIAN RIORDAN, M.D., NEW
FRANKLIN REHABILITATION & HEALTH CARE
FACILITY, LLC, FRANKLIN CENTER FOR
REHABILITATION & NURSING, INC., FRANKLIN
CENTER FOR REHABILITATION & NURSING,
ISRAEL SHERMAN, WILLIAM DUKE, M.D.,
HILLSIDE MANOR COMPREHENSIVE CARE
CENTER, and THE NEW YORK HOSPITAL
MEDICAL CENTER OF QUEENS,

Defendants.
=====X

Defendant **THE NEW YORK HOSPITAL OF QUEENS**, by its attorneys,
WAGNER, DOMAN & LETO, P.C., as and for its automatic disclosure states as follows:

1. The within defendant is unaware of any individuals who are likely to have information relevant to the disputed facts alleged other than the parties to this action and any name that may appear in the medical records.
2. The within defendant does not have possession, custody or control of any documents relevant to the disputed facts, other than the medical records of New York Hospital of Queens which have previously been provided.
3. The within defendant is not claiming any damages in this matter.

4. We have been advised that Defendant New York Hospital of Queens insurance information is as follows: The Medical Center was self-insured for the policy period September 17, 2005 through September 16, 2006. The policy limits are \$2.3 million/\$6.9 million. For the first layer of excess, the Medical Center remained self-insured with limits of \$7.7 million for each and every case with no aggregate.

Defendant, NEW YORK HOSPITAL MEDICAL CENTER OF QUEENS reserves the right to supplement and/or amend its response up to and including the time of trial.

Dated: Mineola, New York
June 18, 2008

Yours, etc.,

WAGNER, DOMAN & LETO, P.C.

Attorneys for Defendants:

NEW YORK HOSPITAL MEDICAL CENTER OF
QUEENS

227 Mineola Boulevard

Mineola, New York 11501

(516) 742-1444

By: 
DIANA M. D'ALESSIO DI LEO

TO:

LEAHEY & JOHNSON, P.C.

Attorneys for Plaintiff

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MARTIN, CLEARWATER & BELL, LLP

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(212) 490-3000

File No.: 22930.00949

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(212) 330-0279

**FUREY, FUREY, LEVERAGE, MANZIONE,
WILLIAMS & DARLINGTON, P.C.**

Attorneys for Defendants:

HILLSIDE MANOR COMPREHENSIVE CARE CENTER

600 Front Street

Hempstead, New York 11550-4494

(516) 538-2500

STATE OF NEW YORK) ss.:
COUNTY OF NASSAU)

AFFIDAVIT OF SERVICE

YVONNE C. PURSOO, being duly sworn, deposes and says that she is not a party to the within action, is over 18 years of age, and resides at Richmond Hill, New York.

On the 24th day of June 2008, she served a copy of the within **RULE 26(a) (1) INITIAL DISCLOSURE** upon the following:

LEAHEY & JOHNSON, P.C.

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120 Wall Street, Suite 2220
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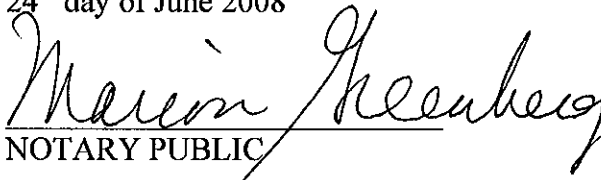
depositing a true copy of same, enclosed in a post-paid, properly addressed wrapper, in an official depository under the exclusive care and custody of the United States Postal Service within the State of New York via First Class Regular Mail.



YVONNE C. PURSOO

Sworn to before me this

24th day of June 2008



NOTARY PUBLIC

MARION GREENBERG
Notary Public, State of New York
No. 4702345
Qualified in Nassau County 1/31/10
Commission Expires _____

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

GEORGE W. BROWN,

Plaintiff,

vs.

THE BROOKDALE HOSPITAL MEDICAL CENTER, SANDEW RAMPAL, M.D., CLASS
SURGERY BROOKLYN GROUP, P.C., THE MOUNT SINAI HOSPITAL, HOWARD CHOI,
M.D., DANIELLE BERNET, M.D., BRIAN RYORDAN, M.D., NEW FRANKLIN
REHABILITATION & HEALTH CARE FACILITY, JLC FRANKLIN CENTER FOR
REHABILITATION & NURSING, INC., FRANKLIN CENTER FOR REHABILITATION &
NURSING, ISRAEL SHERMAN, WILLIAM DOUGL, M.D., HILLSIDE MANOR
COMPREHENSIVE CARE CENTER, and THE NEW YORK HOSPITAL MEDICAL
CENTER OF QUEENS,

Defendants.

RULE 26(c)(1) INITIAL DISCLOSURE

WAGNER, DOMAN & LETOURIC
ATTORNEYS AT LAW
Attorneys for Defendants
Office and Home Office Address Telephone
227 Milneola Blvd
MINERVA, NEW YORK 11501
(516) 722-1322

TO:

Attorney(s) for:

Service of copy of this Affidavit

is hereby admitted

Dated:

Attorney(s)

RULE 26(f)(1)(B) NOTICE

- ☐ If the within (enclosed) copy of the
Notice of Entry entered in the office of the clerk of the within named court
- ☐ If the an Order of which the within is a copy will be presented for settlement to the Hon.
One of the judges of the within named court at
On _____ at _____ NY

DATED

Yours, etc.

WAGNER, DOMAN & LETOURIC
ATTORNEYS AT LAW

Attorneys for
227 Milneola Blvd